

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

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IN RE: PROFEMUR HIP IMPLANT  
PRODUCTS LIABILITY LITIGATION

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MDL No. 2949  
4:20-md-2949-KGB

This Document Relates To:  
All Cases

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**NOTICE OF MDL APPEARANCE AND SUBROGATED LIEN**

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To: All Parties

John Deere Health Benefit Plan for Wage Employees (the “Plan”) by its claims administrator United Healthcare (“UHC”), *designated in the Complaint for the Eastern District of Arkansas Case No. 4:20-cv-00959-KGB as United Healthcare Services, Inc.*, appears by its undersigned counsel and hereby gives notice to the Court and all counsel that it has become obligated to pay and has paid medical and/or disability benefits, in accordance with the terms of the Plan documents, to or on behalf of Plaintiff, Gary Craugh, in the total amount to date of \$131,618.64 and may continue to do so in the future. The Plan was created by Deere & Company pursuant to the Employee Retirement Income Security Act of 1974 (ERISA), 29 U.S.C. §1001-1168, with UHC as the claims administrator. By virtue of such payments made and to be made and the provisions of the self-funded ERISA Plan documents, UHC hereby gives notice of its right of reimbursement and of subrogation out of any payment or proceeds to the Plaintiff, Gary Craugh, as a result of the injury described in the Complaint, whether such payments arise from judgment, settlement, or otherwise. UHC further requests that the Court adjudicate and protect its rights to the extent necessary and applicable.

Dated this April 8, 2021.

FALK LEGAL GROUP  
Attorneys for John Deere Health Benefit  
Plan for Wage Employees by its claims  
administrator United Healthcare

Electronically Signed by Matthew R. Falk  
By: Matthew R. Falk  
(SBN: 1023040)

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